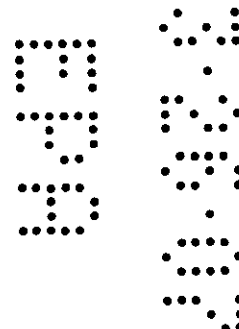


March 23, 2007

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Attention: Mr. Leonard Cole

Subject: Response to Resubmission Request of Data  
for 86-5 Compliance (19March2007)  
AFxRD-038 (EPA Registration Number 71297-XX)  
Active Ingredient = 1-Methylcyclopropene (1-MCP)

AgroFresh, Inc., a wholly owned subsidiary of Rohm and Haas Company, submits corrected full reports in support of an application for a Section 3 registration for the product AFxRD-038, a powder formulation containing 3.8% of the active ingredient 1-methylcyclopropene (1-MCP). The corrections have been done in compliance with Pesticide Registration Notice 86-5.

Included in this second package are the remaining, corrected studies in full (submission date March 23, 2007 on table below) as well as:

The EPA Transmittal letter dated January 17, 2007

The EPA letter dated March 19, 2007

Two copies of updated "New Data Matrix" dated March 23, 2007, one for the Administration packet plus one for the Tolerance Petition

The attachment listing the numbered studies including two studies (#55 and 56) that are being submitted for the first time.

# Agro

## Attachment

Guideline Reference Number	Report Number	Report Title	MRID
40 CFR 160.105	AF-06-073	Analysis of Pure cis2Butene and Assignment of Purity: Aldrich Batch #11620DE	
830.1700	AF-06-083	GLP Characterization of Five Representative Lots of AFxRD-038 Formulation	
830.6303, 6303, and 6304	AF-05-032	Determination of Colour, Physical State and Odour of AFxRD-038	47088601
830.6313 and 6320	AF-06-077	Accelerated Storage Stability of 1-Methylcyclopropene Formulation AFxRD-038	47088602
830.7000	AF-05-033	pH-Determination of an Aqueous Solution of AFxRD-038	47088603
830.7050	AF-05-034	Determination of the UV/VIS Absorption Spectrum of AFxRD-038	47088604
830.7050	AF-01-186	Determination of the UV/VIS Absorption Spectra of 1-MCP	47024907
830.7200 and 7220	AF-05-036	Determination of the Melting Point/Melting Range and the Boiling Point/Boiling Range of AFxRD-038	47088605
830.7300	AF-05-035	Determination of the Bulk Density of AFxRD-038	47088606
830.7520	AF-05-037	Determination of the Particle Size Distribution of AFxRD-038	47088607
830.7860	AF-06-031	Determination of the Water Solubility of AFxRD-038	47088608
835.3110	01RC-0006	1-Methylcyclopropene (1-MCP): An Evaluation of Ready Biodegradability Using the Die-Away Test Method	47024912
850.1010	05RC-069	AFxRD-038: A 48-Hour Static Acute Immobilization Test with the Cladoceran ( <i>Daphnia magna</i> ).	47088609
850.1010	01RC-0002	1-Methylcyclopropene: A 48-Hour Static Acute Immobilization Test with the Cladoceran ( <i>Daphnia magna</i> )	47024914
850.1075	01RC-0001	1-Methylcyclopropene: A 96-Hour Static-Renewal Acute Toxicity test with the Rainbow Trout ( <i>Oncorhynchus mykiss</i> )	47024915
850.1075	05RC-068	AFxRD-038: A 96-Hour Static-Renewal Acute Toxicity Test with the Rainbow Trout ( <i>Oncorhynchus mykiss</i> ).	47088610
850.2100	05RC-071	AFxRD-038: An Acute Oral Toxicity Study with the Northern Bobwhite.	47024917
850.2200	05RC-072	AFxRD-038: A Dietary LC50 Study with the Northern Bobwhite	47024918
850.2200	06RC-130	AFxRD-038: A Dietary LC50 Study with the Mallard	47024919

\* Studies Not Reviewed

## Attachment

Guideline Reference Number	Report Number	Report Title	MRID
850.3020	01RC-0097	1-Methylcyclopropene Alpha-Cyclodextrin Complex (3.3% A.I.): An Acute Toxicity Study with the Honey Bee	47024920
850.4225	06R-1052	1-Methylcyclopropene: Rationale for Waiver of OPPTS 850.4225 Seedling Emergence	47024921
850.4250	06R-1053	1-Methylcyclopropene: Rationale for Waiver of OPPTS 850.4250 Vegetative Vigor	47024922
850.5400	05RC-070	AFxRD-038: A 96-Hour Toxicity Test with the Freshwater Alga ( <i>Pseudokirchneriella subcapitata</i> )	47024923
850.5400	01RC-0003	1-Methylcyclopropene: A 96-Hour Toxicity Test with the Freshwater Alga	47024924
860.1300	AF-06-079	<sup>14</sup> C-1-Methylcyclopropene: Residues in Maize	47088611
860.1300	AF-06-084	Environmental Fate of 1-MCP when Applied Pre-Harvest to Tomato Plants	
860.1300	AF-06-080	<sup>14</sup> C-1-Methylcyclopropene: Residue in Apple	47088612
870.1100	05RC-064	AFxRD-038: Acute Oral Toxicity Up and Down Procedure in Rats	47024928
870.1200	05RC-065	AFxRD-038: Acute Dermal Toxicity Study in Rats - Limit Test	47024929
870.2400	05RC-067	AFxRD-038: Primary Eye Irritation Study in Rabbits	47024930
870.2500	05RC-066	AFxRD-038: Primary Skin Irritation Study in Rabbits	47024931
Not Applicable	06-R-1048	Dermal Sensitization Potential of AFxRD-038: Rationale to Use Surrogate Toxicology Data	47024932
Not applicable	06R-1011	Acute Inhalation Potential of AFxRD-038: Rationale to Use Surrogate Toxicology Data	47024933
Not applicable	00R-183B	1-Methylcyclopropene Two-Week Inhalation Range-Finding Study in Male Rats	47024934
OECD 104	AF-06-001	Calculation of the Vapour Pressure of AFxRD-038	47088613
OECD 104	AF-01-190	Determination of the Vapour Pressure of 1-MCP	47088614
OECD 105	AF-01-191	Determination of the Water Solubility of 1-MCP	47088615
OECD 111	AF-01-188	Hydrolysis Determination of 1-MCP at Different pH Values	47024938
OECD 312	AF-06-081	<sup>14</sup> C-1-Methylcyclopropene: Leaching in Four Soils	
OECD 417	01R-004E	<sup>14</sup> C-1-Methylcyclopropene: Toxicokinetic Study in Rats	47088616

\* Studies Not Reviewed

## Attachment

Guideline Reference Number	Report Number	Report Title	MRID
Not Applicable	01RC-0283	1-Methylcyclopropene: Toxicity Test with the Parasitic Wasp, <i>Aphidius Rhopalosiphii</i> (Hymenoptera: Braconidae)	47024941
Not Applicable	AF-01-153	Determination of the Flammability of 1-MCP Formulation	47024942
Not Applicable	01RC-0282	1-Methylcyclopropene: Laboratory Toxicity Test with the Predatory Mite, <i>Typhlodromus Pyri</i> Scheuten (Acari: Phytoseiidae)	47088617
Not Applicable	01RC-0284	1-Methylcyclopropene: A 14-Day Acute Toxicity Test with the Earthworm <i>Eisenia Fetida</i>	47024944
Group A – Product Chemistry	AF-06-010	Product Chemistry AFxRD-038 Formulation	
Not applicable	06-RC-193	AFxRD-038: Laboratory Acute Toxicity Test with the Parasitic Wasp, <i>Aphidius Rhopalosiphii</i> (Hymenoptera: Braconidae)	47024946
Not applicable	06RC-195	AFxRD-038: Laboratory Acute Toxicity Test with <i>Peocilus Cupreus</i> L. (Coleoptera: Carabidae)	47024947
Not Applicable	05R-1088	1-Methylcyclopropene: Structure-Activity Hazard Identification Screen Using DEREK	47088618
Not applicable	06R-1056	Pre-harvest Use of 1-Methylcyclopropene on Agricultural Crops: Environmental Risk Assessment	47024949
Not Applicable	06R-1050	1-Methylcyclopropene: Rationale for Waiver of OPPTS 880.3550 Immunotoxicity	47024950
Not Applicable	01RC-1017	Atmospheric Fate of 1-Methylcyclopropene	
Not Applicable	01RC-1016	A laser Photolysis – Laser Induced Fluorescence Determination of the Rate Coefficient for the Reaction of the Hydroxyl Radical with 1-Methylcyclopropene	
Not applicable	AF-06-078	GLP Validation of the GC/FID Method for the Determination of 1-MCP in SmartFresh™ and AFxRD-038 Formulations using cis-2-Butene as a Calibration/Internal Standard	
Not applicable	06-R-1055	Pre-Harvest Use of 1-Methylcyclopropene on Agricultural Crops: Toxicology Summary and Assessment of Worker, Bystander and Consumer Risks	47024954

\* Studies Not Reviewed

## Attachment

	Guideline Reference Number	Report Number	Report Title	MRID
55	850.4150 and 4250	06RC-212	AFxRD-038: A Toxicity Test to Determine the Effects of the Test Substance on Vegetative Vigor of Ten Species of Plants	<b>47088619</b>
56	850.4100 and 4225	06RC-213	AFxRD-038: A Toxicity Test to Determine the Effects of the Test Substance on Seedling Emergence of Ten Species of Plants	<b>47088620</b>